

# Federal Defenders OF NEW YORK, INC.

Southern District  
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David E. Patton  
Executive Director  
and Attorney-in-Chief

**MEMO ENDORSED**

Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge

November 1, 2023

**BY ECF**

The Honorable Jessica G.L. Clarke  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**RE: United States v. Jorge Escarraga Medina  
22 Cr. 413 (JGLC)**

Dear Judge Clarke:

I write to request, with the consent of the Government, a 45-day adjournment of the Rule 12 status conference, which is currently scheduled for Monday, November 6, 2023, at 11:00 a.m., to Monday December 18, 2023. This is the defense's first request for an adjournment of the Rule 12 status conference. An adjournment is warranted because I require additional time to review the discovery with Mr. Medina, who was recently transferred from Westchester County Jail to MDC Brooklyn. An adjournment is also warranted to allow the parties to further discuss a pre-trial resolution in advance of any Rule 12 practice. The parties further agree that it is in the interests of justice to exclude the additional period of delay between November 6, 2023, and December 18, 2023 from Speedy Trial Act calculations because the interests of the public and the defendant in a speedy trial are outweighed by the need to afford the defense adequate time to review discovery and to allow the parties to negotiate a pre-trial resolution before any Rule 12 motions are filed. 18 U.S.C. § 3161(h)(7)(A).

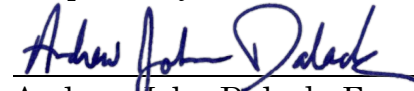
I thank the Court for its consideration of this application.

The status conference scheduled for November 6, 2023 is ADJOURNED to December 18, 2023 at 3:00 p.m. The Court finds that the ends of justice served by excluding the time between today and December 18, 2023, outweigh the best interests of the public and the Defendant in a speedy trial as provided in 18 U.S.C. § 3161(h)(7)(A) because, among other things, the parties are presently engaged in discussions regarding a potential disposition of this matter and the exclusion would allow for those discussions to continue. It is hereby ORDERED that the time between today and December 18, 2023, is excluded.

Dated: November 2, 2023  
New York, New York

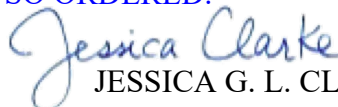
Cc: AUSA Andrew Jones

Respectfully Submitted,



Andrew John Dalack, Esq.  
Assistant Federal Defender, SDNY  
(646) 315-1527

SO ORDERED.



JESSICA G. L. CLARKE  
United States District Judge